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United States Magistrate Judge Robert Lehrburger
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Robert Nock v. Spring Energy RRH, LLC et al.*, United States District Court,
Southern District of New York, Case No. 1:23-cv-01042

Dear Judge Lehrburger:

This office represents Defendants, Spring Energy RRH, LLC d/b/a Spring Power & Gas; RRH Energy Services LLC; and Richmond Road Holdings, LLC.

I write jointly and with the consent of counsel for the Plaintiff to respectfully request that the Court: (i) lift the prior order entered by your honor on August 19, 2023, which bifurcated individual and class discovery in this matter (ECF No. 52); and (ii) implement a new scheduling order for this action. Following a meet and confer, the parties have determined that the current bifurcation is no longer tenable, and that a wider scope discovery is appropriate. To allow sufficient time for the parties to complete discovery regarding all issues in this action, which will involve third-party discovery, the parties agree an additional 180 days to complete fact discovery would be appropriate. Under such a schedule, the following deadlines would apply.

- End of fact discovery – April 22, 2024;
- End of expert discovery – June 6, 2024;

Defendants have committed to serving amended discovery responses (which comply, e.g., with Rule 34(b)(2)(B) and (C)) by November 10. If the foregoing is acceptable to the Court, the parties request that Your Honor “so order” this letter. The parties would be happy to answer any questions the Court may have.

Thank you for your consideration of this matter.

Granted.

Respectfully,
/s/ Elliot A. Hallak
Elliot A. Hallak

SO ORDERED:

10/30/2023


Judge Robert Lehrburger
United States District Judge